

Richard M. Golomb
NJ Bar No. 013181984
Kevin Fay
NJ Bar No. 005692010
GOLOMB LEGAL, P.C.
130 N. 18th St., Ste. 1600
Philadelphia, PA 19103
Telephone: (215) 985-9177
rgolomb@golomblegal.com
kfay@golomblegal.com

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

**JONI S. BYNUM, DONNALETTA F.
RUIZ, SHELLEY WILLIAMS, ROBIN
COBURN, AND JAMES COBURN,
INDIVIDUALLY AND ON BEHALF
OF A PROPOSED CLASS**

Plaintiffs,

v.

**LLT MANAGEMENT LLC F/K/A
LTL MANAGEMENT LLC;
JOHNSON & JOHNSON; NEW JJCI;
JOHNSON & JOHNSON HOLDCO (NA)
INC.; JANSSEN PHARMACEUTICALS,
INC.; KENVUE INC.; J&J SERVICES,
INC.; AND JOHN DOES 1-100,**

Defendants.

**Case No. 3:24-cv-07065
(MAS) (RLS)**

STIPULATION

WHEREAS, on May 16, 2025, the Parties submitted a joint proposed schedule [ECF 33] regarding responses to the Amended Complaint;

WHEREAS, the joint proposed schedule projected that Plaintiffs' opposition to Defendants' Motion to Dismiss would be due by August 14, 2025 and Defendants' reply would be due by September 4, 2025;

WHEREAS, on May 19, 2025, the Court granted the joint proposed schedule [ECF 35];

NOW, THEREFORE, with the consent of all parties, Plaintiffs request entry of an Order extending by one (1) week the deadlines in the joint proposed schedule such that Plaintiffs' opposition to Defendants' Motion to Dismiss would be due by **August 21, 2025** and Defendants' reply would be due by **September 11, 2025**;

IT IS SO STIPULATED.

Dated: August 6, 2025

GOLOMB LEGAL, P.C.

/s/ Kevin W. Fay
Richard M. Golomb
N.J. Bar No. 013181984
Kevin Fay
NJ Bar No 005692010
GOLOMB LEGAL, P.C.
130 N. 18th St., Ste. 1600
Philadelphia, PA 19103
Telephone: (215) 985-9177
rgolomb@golomblegal.com
kfay@golomblegal.com

Attorney for Plaintiffs

Dated: August 6, 2025

BARNES & THORNBURG LLP

/s/ Jessica L. Brennan
Jessica L. Brennan

BARNES & THORNBURG LLP
67 E. Park Place, Ste. 100
Morristown, NJ 07960
Telephone: (973) 775-6101
jessica.brennan@btlaw.com

Attorney for Defendants

CERTIFICATE OF SERVICE

In accordance with Civil Local Rule 14(b), I filed this document by the Court's ECF system, which will electronically serve the papers on counsel for all parties.

Date: August 6, 2025

/s/ Kevin W. Fay
Kevin W. Fay
Richard M. Golomb

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated:

HON. MICHAEL A. SHIPP
UNITED STATES DISTRICT JUDGE